

ORIGINAL

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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JAN 19 2006 ay
at 3 o'clock and 19 min P M
SUE BEITIA, CLERK

Attorney for Defendant
ETHAN SAGE

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

CARL RAGASA AND KANANI
RAGASA

Plaintiffs,

vs.

COUNTY OF KAUAI, KAUAI FIRE
DEPARTMENT, DAVID SPROAT,
ROBERT KADEN, SIDNEY KINI,
AND ETHAN SAGE,

Defendants.

) CIVIL NO. 03-00540 BMK
)
) DEFENDANT ETHAN SAGE'S
) SUBSTANTIVE JOINDER TO
) "DEFENDANTS COUNTY OF
) KAUA'I, KAUA'I FIRE
) DEPARTMENT, DAVID SPROAT,
) ROBERT KADEN and SIDNEY
) KINI'S REPLY MEMORANDUM IN
) SUPOPRT OF THEIR MOTION FOR
) SUMMARY JUDGMENT ON
) COUNTS III - VI OF PLAINTIFFS
) CARL RAGASA AND KANANI
) RAGASA'S COMPLAINT FILED ON
) OCTOBER 3, 2003 (CONSPIRACY,
) RESPONDEAT SUPERIOR,
) INTENTIONAL INFLICTION OF
) EMOTIONAL DISTRESS,
) NEGLIGENT INFLICTION OF
) EMOTIONAL DISTRESS), FILED
) ON 9/2/05", FILED ON 1/13/06;
) CERTIFICATE OF SERVICE
)

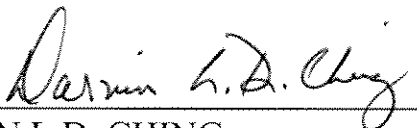
)
) Hearing:
) Date: November 15, 2005
) Time: 2:30 p.m.
) Judge: Barry M. Kurren
)
) TRIAL DATE: MARCH 7, 2006
)

DEFENDANT ETHAN SAGE'S SUBSTANTIVE JOINDER TO
"DEFENDANTS COUNTY OF KAUA'I, KAUA'I FIRE DEPARTMENT,
DAVID SPROAT, ROBERT KADEN and SIDNEY KINI'S REPLY
MEMORANDUM IN SUOPRT OF THEIR MOTION FOR SUMMARY
JUDGMENT ON COUNTS III - VI OF PLAINTIFFS CARL RAGASA AND
KANANI RAGASA'S COMPLAINT FILED ON OCTOBER 3, 2003
(CONSPIRACY, RESPONDEAT SUPERIOR, INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS, NEGLIGENCE INFLICTION OF EMOTIONAL
DISTRESS), FILED ON 9/2/05", FILED ON 1/13/06

Defendant Ethan Sage, by and through his attorney, Darwin L.D.

Ching, pursuant to Rule 7 of the Federal Rules of Civil Procedure, hereby joins in
"Defendants County of Kauai, Kauai Fire Department, David Sproat, Robert
Kaden and Sidney Kini's Reply Memorandum In Support of Their Motion for
Summary Judgment on Counts III – VI of Plaintiffs Carl Ragasa and Kanani
Ragasa's Complaint filed on October 3, 2003 (Conspiracy, Respondeat Superior,
Intentional Infliction of Emotional Distress, Negligent Infliction of Emotional
Distress), filed on 9/2/05", filed on January 13, 2006, presently scheduled for
hearing on January 24, 2006 at 10:00 a.m. before the Honorable Barry M. Kurren.

DATED: Honolulu, Hawaii, January 19, 2006.



DARWIN L.D. CHING
Attorney for Defendant Ethan Sage

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

CARL RAGASA AND KANANI)	CIVIL NO. 03-00540 BMK
RAGASA)	
)	CERTIFICATE OF SERVICE
Plaintiffs,)	
)	
vs.)	
)	
COUNTY OF KAUAI, KAUAI FIRE)	
DEPARTMENT, DAVID SPROAT,)	
ROBERT KADEN, SIDNEY KINI,)	
AND ETHAN SAGE,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was duly served on the following parties via U.S. Mail and/or hand delivery (as indicated below) on the date of filing herein.

Mark Zenger, Esquire
Donna E. Richards, Esquire
Richards & Zenger
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Via U.S. Mail

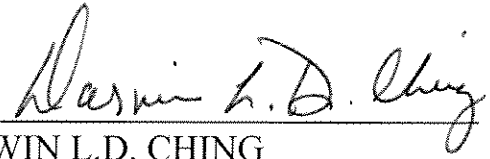
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Via Hand Delivery

Attorneys for Defendants County of Kauai,
Kauai Fire Department, David Sproat,
Robert Kaden and Sidney Kini

DATED: Honolulu, Hawaii, January 19, 2006.



DARWIN L.D. CHING
Attorney for Defendant Ethan Sage